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15 *Attorneys for Defendants Coinbase Global, Inc.,*
16 *Brian Armstrong, Alesia J. Haas, Jennifer N. Jones,*
17 *Marc L. Andreessen, Frederick Ernest Ehram III,*
18 *Kathryn Haun, Kelly Kramer, Gokul Rajaram,*
and Fred Wilson

19 *Additional Counsel on Signature Page*

20 **UNITED STATES DISTRICT COURT**
21 **NORTHERN DISTRICT OF CALIFORNIA**
22 **SAN JOSE DIVISION**

23 IN RE COINBASE GLOBAL, INC.
24 SECURITIES LITIGATION

No. 5:21-cv-05634-EJD

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO RESPOND TO
COMPLAINT AND REVISING BRIEFING
SCHEDULE**

Pursuant to Local Rules 6-2 and 7-12, Lead Plaintiff Hsiu-Mei Yu (“Plaintiff”) and Defendants Coinbase Global, Inc., (“Coinbase”), Brian Armstrong, Alesia J. Haas, Jennifer N. Jones, Marc L. Andreessen, Frederick Ernest Ehrsam III, Kathryn Haun, Kelly Kramer, Gokul Rajaram, and Fred Wilson (collectively “Defendants,” and together with Plaintiff, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree as follows and jointly request that the Court enter the below Order approving this stipulation.

WHEREAS, on July 22, 2021, Donald Ramsey filed a putative securities fraud class action (Dkt. No. 1) asserting claims under the Securities Act of 1933, which is governed by the Private Securities Litigation Reform Act of 1995 (15 U.S.C. § 78u-4 *et seq.*) (the “PSLRA”), and the case was assigned to the Honorable Vince Chhabria (Dkt. No. 5);

WHEREAS, the Parties submitted a joint Stipulation and Proposed Order Extending Time to Respond to Complaint and Vacating Certain Deadlines on September 15, 2021 (Dkt. No. 11), which Judge Chhabria granted, with modifications, on September 20, 2021 (Dkt. No. 12);

WHEREAS, on October 28, 2021, following the hearing on the motion to appoint lead counsel, Judge Chhabria set the following briefing schedule: Plaintiff’s Consolidated Complaint due December 20, 2021 (“Complaint”), Defendants’ Motion to Dismiss due February 1, 2022 (“Motion”), Plaintiff’s Opposition to the Motion due March 1, 2022 (“Opposition”), Defendants’ Reply in Support of their Motion due March 22, 2022 (“Reply”), and oral argument scheduled for April 14, 2022 (Dkt. No. 86);

WHEREAS, on November 5, 2021, Judge Chhabria appointed Hsiu-Mei Yu as Lead Plaintiff (Dkt. No. 87);

WHEREAS, on December 20, 2021, Plaintiff filed the Amended Complaint (Dkt. No. 90);

WHEREAS, on January 21, 2022, Judge Chhabria issued an Order of Recusal, directed that the matter be reassigned pursuant to the Assignment Plan, and vacated all pending dates of motions, pretrial conferences, and trial (Dkt. No. 99);

1 **WHEREAS**, on January 24, 2022, pursuant to the Order Reassigning Case, the matter
 2 was reassigned to the Honorable Edward J. Davila. All hearing and trial dates were vacated, but
 3 existing briefing schedules remain unchanged (Dkt. No. 100);

4 **WHEREAS**, the Parties have met and conferred and agreed to extend the date for the
 5 filing of the Motion from February 1, 2022 to February 8, 2022, the date for the filing of
 6 Plaintiff's Opposition from March 1, 2022 to March 8, 2022, and the date for the filing of
 7 Defendants' Reply from March 22, 2022 to March 29, 2022;

8 **WHEREAS**, the Parties agree that modest extensions of the briefing deadlines are
 9 warranted in light of the foregoing changes in judicial assignment, the Parties' need to reserve a
 10 hearing date with this Court, and to allow the Parties adequate time for briefing;

11 **WHEREAS**, this extension of time will not alter the date of any other event or deadline
 12 already fixed by Court order;

13 NOW, THEREFORE, pursuant to Civil Local Rule 6-2, the Parties hereby stipulate,
 14 subject to Court approval, that the briefing schedule will be modified as follows:

- 15 1. Defendants shall file their Motion to Dismiss the Complaint by February 8, 2022.
- 16 2. Plaintiff shall file her Opposition to Defendants' Motion to Dismiss by March 8,
 17 2022.
- 18 3. Defendants shall file their Reply in Support of their Motion to Dismiss by March
 19 29, 2022.
- 20 4. The Parties shall reserve a hearing date for Defendants' Motion to Dismiss
 21 pursuant to the Court's standing order.

1 Dated: January 26, 2022

Respectfully submitted,

2
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Honorable Edward J. Davila
UNITED STATES DISTRICT JUDGE

FILER'S ATTESTATION

Pursuant to Civil L. R. 5-1(h)(3), regarding signatures, I hereby attest that concurrence in the filing of the document has been obtained from all of the signatories above.

DATED: January 26, 2022

/s/ Matthew Rawlinson
Matthew Rawlinson